Remarks

Claims 1, 7 and 28 have been amended. Claims 1-34 remain in the application. Reexamination and reconsideration of the claims, in view of the discussion below, are respectfully requested.

The examiner rejected claims 7-14 under 35 U.S.C. 112, second paragraph, as being indefinite. Claim 7 has been amended as suggested by the examiner to overcome this rejection.

The examiner rejected claims 1-6, 15-20 and 22-29 under 35 U.S.C. 102(b) as being anticipated by Grover (U.S Patent No. 5,818,437).

Independent claim 1 has been amended to further distinguish over Grover. The basis for the amendment to refer to the "relationship with other data strings" is to be found, for example, in paragraph [0191] of the published application. The basis for the reference to context ratios is to be found, for example, in paragraphs [0045] and [0048] of the published application and claim 28 currently on file.

Grover discloses using the frequency of use by a user to prioritize the words which match a particular key sequence; the priority for each word being incremented each time the word is used. The examiner considers that "frequency of use is probability information" (as summarized at paragraph 52 of the Office Action) and, as such, that this feature of claim 1 was known from Grover.

Applicants respectfully submit that frequency data is not the same as probability information. Probability information represents the relative possibility that an event will occur and is typically expressed by the ratio of the number of actual occurrences to the total number of possible occurrences. In contrast, frequency data represents the number of times that an event

has occurred. This constitutes a fundamental distinction between the claimed invention and the technique disclosed in Grover.

By storing and utilizing probability information the claimed invention can assess the relationship between the input data strings and other data strings. The invention requires that probability information relating to the relationship between a data string and a plurality of other data strings in a sequence is stored in each data dictionary.

The probability information is a context ratio which provides an indication of the likelihood of a given data string being grouped with other data strings. The context ratio is based on statistical derivatives of language as well as historical usage by the user. By storing probability information relating to other data strings, the method considers the context in which the data string is being used, thereby enabling improved data string prediction.

In contrast, Grover considers purely the frequency of use of the data strings to prioritize the data strings displayed for selection by the user. There is no disclosure of considering the relationship between the words linked to a key sequence with other words in a sequence. The resulting predictions are made in isolation without any reference to other words (i.e. no contextualization). As such, the technique described in Grover is restricted to the user input key sequence irrespective of the context in which the data string is being used.

At paragraph 23 of the Office Action, the Examiner indicated that Grover also anticipated dependent claim 28. For the avoidance of doubt, it is submitted that Grover does not disclose context ratios within the meaning of the present application.

The prior art of record does not hint or suggest considering the relationship between the input data string and other data strings. The claimed invention requires that a context ratio is

stored to determine the likelihood of a given data string being grouped with more than one other data string. The context ratio thereby considers the context of the input data string in a longer data string and can allow enhanced prediction.

In the light of the above discussion, we respectfully submit that amended claim 1 is not anticipated by Grover, and should be allowed. Furthermore, since claims 2-34 all depend, either directly or indirectly, from claim 1, these claims should also be allowable. Therefore, allowance of claims 1-34 is respectfully requested.

A credit card payment submitted *via* EFS Web in the amount of $930.00, representing the fee for a large entity under 37 C.F.R. § 1.17(e) for Request for Continued Examination is enclosed. This amount is believed to be correct; however, the Commissioner is hereby authorized to charge any additional fees which may be required, or credit any overpayment to Deposit Account No. 14-0629.

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